

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION**

In re:)	
)	Chapter 11
)	
STEWARD HEALTH CARE SYSTEM LLC,)	Case No. 24-90213 (CML)
<i>et al.</i> ,)	
)	
Debtors. ¹)	(Jointly Administered)
)	

**THE OFFICIAL COMMITTEE OF UNSECURED CREDITORS
OF STEWARD HEALTH CARE SYSTEM LLC *ET AL.*'S
WITNESS AND EXHIBIT LIST FOR HEARING ON JUNE 3, 2024**

The Official Committee of Unsecured Creditors (the “Committee”) of Steward Health Care System LLC, *et al.* (the “Debtors”), by and through its undersigned proposed counsel, hereby submit this witness and exhibit list (the “Witness and Exhibit List”) for the hearing (the “Hearing”) scheduled for **June 3, 2024 at 1:00 p.m. (prevailing Central Time)** before the Honorable Christopher M. Lopez at the United States Bankruptcy Court for the Southern District of Texas (the “Bankruptcy Court”), 515 Rusk Street, Courtroom 401, Houston, Texas 77002, on:

1. *Emergency Motion of Debtors for Interim and Final Orders (I) Authorizing Debtors to (A) Continue Their Existing Cash Management System, (B) Maintain Existing Business Forms and Intercompany Arrangements, (C) Continue Intercompany Transactions, and (D) Continue Employee Credit Card Program; (II) Extending Time to Comply with Requirements of 11 U.S.C. § 345(b); and (III) Granting Related Relief [Docket No. 5];*

2. *Emergency Motion of Debtors for Interim and Final Orders (I) Authorizing the Debtors to (A) Continue Insurance Policies, Surety Bonds, and Letters of Credit and (B) Satisfy Obligations Related Thereto; (II) Modifying the Automatic Stay to Permit Employees to Proceed with Workers’ Compensation Claims; and (III) Granting Related Relief [Docket No. 6];*

¹ A complete list of each of the Debtors in these chapter 11 cases may be obtained on the website of the Debtors’ claims and noticing agent at <https://restructuring.ra.kroll.com/Steward>. The Debtors’ service address for purposes of these chapter 11 cases is 1900 N. Pearl Street, Suite 2400, Dallas, Texas 75201.

3. *Emergency Motion of Debtors for Interim and Final Orders (I) Authorizing Debtors to (A) Maintain, Administer, Modify, and Renew Their Existing Refund Programs and Pay or Otherwise Honor Prepetition Obligations Related Thereto, and (B) Honor Prepetition Health Plan Administration* [Docket No. 7];

4. *Emergency Motion of Debtors for an Order (I) Approving Debtors' Proposed Form of Adequate Assurance of Payment to Utility Companies; (II) Establishing Procedures for Resolving Objections by Utility Companies; (III) Prohibiting Utility Companies From Altering, Refusing, or Discontinuing Service; and (IV) Granting Related Relief* [Docket No. 9];

5. *Emergency Motion of Debtors for Interim and Final Orders (I) Authorizing Debtors to Pay (A) Critical Vendor Claims, (B) Lien Claims, and (C) 503(B)(9) Claims; and (II) Granting Related Relief* [Docket No. 13];

6. *Emergency Motion of Debtors for Interim and Final Orders (I) Authorizing the Debtors to (A) Obtain Junior Lien Postpetition Financing, (B) Use Cash Collateral, and (C) Grant Liens and Provide Superpriority Administrative Expense Claims; (II) Granting Adequate Protection to Certain Prepetition Secured Parties; (III) Modifying the Automatic Stay; (IV) Scheduling A Final Hearing; and (V) Granting Related Relief* [Docket No. 46] (the "DIP Motion"); and

7. *Emergency Motion of Debtors for Entry of an Order (I) Approving (A) Global Bidding Procedures for Sales of the Debtors' Assets, (B) Form and Manner of Notice of Sales, Auctions, and Sale Hearings, and (C) Assumption and Assignment Procedures and Form and Manner of Notice of Assumption and Assignment; (II) Authorizing Designation of Stalking Horse Bidders; (III) Scheduling Auctions and Sale Hearings; and (IV) Granting Related Relief* [Docket No. 281].

WITNESSES

The Committee may call any of the following witnesses at the Hearing:

1. Any witness necessary to lay the foundation for the admission of exhibits;
2. Any witness listed or called by any other party; and
3. Any rebuttal and/or impeachment witnesses.

The Committee reserves the right to cross-examine any witness called by any other party.

EXHIBITS

The Debtors may offer into evidence any one or more of the following exhibits:

EXHIBIT NO.	DESCRIPTION	M A R K	O F F E R	O B J E C T	A D M I T	W/D	Disposition After Hearing
	Any exhibit necessary to rebut the evidence or testimony of any witness offered or designated by any other party						
	Any exhibit necessary for impeachment purposes						
	Any exhibit listed by any other party						
	Any documents produced by any party pursuant to discovery requests						
	Any pleading or document filed in the above-captioned case						

RESERVATION OF RIGHTS

The Committee reserves all rights, including but not limited to the right to amend, revise, supplement, or withdraw this Witness and Exhibit List at any time, to designate additional witnesses and exhibits, to call or cross examine any person identified as a witness by any other party in interest or introduce any document identified as an exhibit by any other party in interest, and to offer additional witnesses and exhibits at the Hearing for purposes of impeachment or rebuttal, in response to witnesses and evidence offered by any other party, and for any other permissible purpose under the Federal Rules of Bankruptcy Procedure, the Federal Rules of Civil Procedure, and the Federal Rules of Evidence.

Dated: May 30, 2024

AKIN GUMP STRAUSS HAUER & FELD LLP

/s/ Marty L. Brimmage Jr.

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*Proposed Counsel to the Official Committee of
Unsecured Creditors*

Certificate of Service

I certify that on May 30, 2024, I caused a copy of the foregoing document to be served by the Electronic Case Filing System for the United States Bankruptcy Court for the Southern District of Texas.

/s/ Marty L. Brimmage Jr.

Marty L. Brimmage Jr.